

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE**

<b>JOHN DOE,</b>	)	
	)	
<i>Plaintiff,</i>	)	<b>Civil Action No: 3:22-cv-181</b>
	)	
v.	)	
	)	<b>Judge Campbell</b>
<b>William Lee, Governor of the State of Tennessee, in his official capacity;</b>	)	
	)	<b>Magistrate Judge Frensley</b>
<b>And,</b>	)	
	)	
<b>David Rausch, Director of the Tennessee Bureau of Investigation, in his official capacity;</b>	)	
	)	
<b>And,</b>	)	<b>JURY DEMAND</b>
	)	
<b>Metropolitan Government of Nashville- Davidson County, Tennessee;</b>	)	
	)	
	)	
<i>Defendants.</i>	)	

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**PLAINTIFF’S MOTION TO FILE EXHIBITS UNDER SEAL**

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Comes now Plaintiff, by and through Counsel, and moves this Honorable Court pursuant to Local Rule 5.03 and Administrative Practices and Procedures for ECF Filing § 5.07 to authorize Defendant to make a sealed filing of the exhibits to his Motion for Temporary Restraining Order and Preliminary Injunction. All three exhibits contain highly sensitive, identifying information that, if publicly disclosed, would totally undermine Plaintiff’s pending Motion to Proceed Under Pseudonym (ECF 6, Motion).

Plaintiff will disclose copies of all three exhibits to Counsels for Defendants contemporaneously with the filing of this motion.

Respectfully submitted,

*s/ Kyle Mothershead*

Kyle Mothershead, BPR 22953

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### **CERTIFICATE OF SERVICE**

I hereby certify that on **March 30, 2022**, Plaintiff's **Motion to File Under Seal** was filed electronically with the Court's electronic filing system. Notice of this filing will be electronically served by operation of the Court's electronic filing system on **Attorneys Miranda Jones and Cody Brandon, Counsels for Defendants Lee and Rausch**, at [miranda.jones@ag.tn.gov](mailto:miranda.jones@ag.tn.gov) and [cody.brandon@ag.tn.gov](mailto:cody.brandon@ag.tn.gov), and on Attorney Brook Fox, Counsel for **Defendant Metro**, at [Brook.Fox@nashville.gov](mailto:Brook.Fox@nashville.gov).

*s/ Kyle Mothershead*

Kyle Mothershead, BPR 22953